

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re: ALAN MANUEL LAVIN,	:	Chapter 13
aka ALAN M. LAVIN	:	Case No. 5:17-bk-04597
aka ALAN LAVIN, and,	:	
ELECTA KAY LAVIN	:	
aka ELECTA K. LAVIN	:	
aka ELECTA LAVIN	:	
Debtors,	:	

DEUTSCHE BANK NATIONAL TRUST COMPANY	:	Motion for
Movant	:	Relief from Stay
	:	
v.	:	
	:	
ALAN MANUEL LAVIN AND	:	
ELECTA KAY LAVIN	:	
Respondent	:	
JACK N. ZAHAROPOULOS,	:	
Trustee.	:	

ANSWER TO MOTION FOR RELIEF ON BEHALF OF DEBTOR

AND NOW comes Debtors, ALAN MANUEL LAVIN and ELECTA KAY LAVIN, by and through their attorneys, Newman Williams, and answer the Motion for Relief of Deutsche Bank National Trust Company as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Debtors believe they are current with post-petition mortgage payments.
5. Denied. Debtors believe they are current with post-petition mortgage payments.
6. Admitted that Debtors must continue post-petition mortgage payments.
7. Denied that Movant is entitled to costs and/or fees.
8. Denied. Debtors believe they are current with post-petition mortgage payments, in which event termination of the automatic stay is not warranted.

9. Denied. All communication should be with the Debtors' undersigned attorney.
10. Denied. This is a conclusion of law to which no response is required.
11. Denied that relief from the co-debtor stay is warranted.
12. Denied. This is a request for relief to which no response is required.

Respectfully Submitted,

NEWMAN WILLIAMS, P.C.

By: /s/ Vincent Rubino, Esq.

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Attorney for Debtor